

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CAROL KULIG

-X

No. Civ. 13-cv-04715-PKC

on behalf of herself and all others similarly situated

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Plaintiff

)

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-V._•-

)

MIDLAND FUNDING, LLC,

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**MIDLAND CREDIT MANAGEMENT, INC.
ENCORE CAPITAL GROUP, INC.**

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ENCORE CAPITAL GROUP, INC.
formerly MCM CAPITAL GROUP, INC.)

FORMERLY MEMPHIS CAPITAL GROUP, INC.)
ANDA PEREZ)

AMANDA FERÉZ

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Defendants

)

AHMAD KESHAVARZ, an attorney licensed to practice before this Court and in the
State of New York, declares the following to be true under penalty of perjury:

1. I am one of the attorneys for the plaintiff in the above-captioned case and make this declaration in support of my application to withdraw as attorney of record, to be replaced by Brian L. Bromberg of the Bromberg Law Office, P.C.

2. By Order dated September 26, 2014, and upheld on reconsideration on November 20, 2014, ECF #106 and ECF#120, respectively, this Court directed that if Mr. Kulig wished to continue with this case as a class action, she should retain substitute counsel.

3. After discussing the matter with my office and with Mr. Bromberg, Ms. Kulig still wishes to pursue this case as a class action and has retained Mr. Bromberg and his office to substitute for my office.

4. Mr. Bromberg has been appointed as class counsel by this Court and others.

5. Accordingly, I am attaching, as Exhibit A, a copy of the substitution form signed

by me, by Ms. Kulig, and by Mr. Bromberg.

6. I am not asserting any retaining or charging lien.

7. In addition, an associate from my office, Michael Pereira, Esq., entered an appearance to work on this case through my office. Because my office is no longer going to be appearing, Mr. Pereira should be relieved as well.

8. The status of the case is as follows: other than a decision on the adequacy of the proposed class counsel, the motion for class certification has not been ruled upon. No other motions are pending and the discovery deadline has not passed.

9. I am serving a copy of this declaration and the accompanying substitution of attorney form by regular first-class mail on Ms. Kulig at her home address.

10. I am also serving a copy of this declaration and the accompanying substitution of attorney form by regular first-class mail on Mr. Bromberg at his office address.

11. Finally, I am serving a copy upon all attorneys who have entered appearances by ECF.

12. Accordingly, I respectfully request that this Court substitute Mr. Bromberg for myself and for Mr. Pereira.

Dated: Brooklyn, New York
December 20, 2014

/s/
Ahmad Keshavarz

CERTIFICATE OF SERVICE

I hereby certify that on this day I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Defendants

MIDLAND FUNDING, LLC;
MIDLAND CREDIT MANAGEMENT, INC;
ENCORE CAPITAL GROUP, INC; and
AMANDA PEREZ

By and through their attorneys of record

Kevin P. Wallace

Karen F. Lederer

Timothy St. George

Troutman & Sanders, LLP

The Chrysler Building

405 Lexington Avenue

New York, NY 10174

I further certify that on this day I served the above referenced document to the party listed below via postal mail:

Carol Kulig
820 West End Ave., Apt. 14B
New York, NY 10025

Date: December 20, 2014

Brooklyn, NY

/s/

Ahmad Keshavarz
Plaintiff's Attorney